

Hearing Date and Time: July 1, 2009 at 10:00 a.m. (prevailing Eastern time)

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
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NOTICE OF EXPEDITED MOTION FOR ORDER UNDER 11 U.S.C. § 363 AND FED. R.
BANKR. P. 2002, 6004, AND 9014 AUTHORIZING DEBTORS TO PROVIDE EXPENSE
REIMBURSEMENT TO PLATINUM EQUITY ADVISORS, LLC IN CONNECTION
WITH SALE OF DEBTORS' ASSETS PURSUANT TO MASTER DISPOSITION AGREEMENT

PLEASE TAKE NOTICE that on June 25, 2009, Delphi Corporation ("Delphi")
and certain of its subsidiaries and affiliates, debtors and debtors-in-possession in the above-
captioned cases (collectively, the "Debtors"), filed an Expedited Motion For Order Under 11

U.S.C. § 363 And Fed. R. Bankr. P. 2002, 6004, And 9014 Authorizing Debtors To Provide Expense Reimbursement To Platinum Equity Advisors, LLC In Connection With Sale Of Debtors' Assets Pursuant To Master Disposition Agreement (the "Motion").

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on July 1, 2009 at 10:00 a.m. (prevailing Eastern time) (the "Hearing") before the Honorable Robert D. Drain, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room 610, New York, New York 10004.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must (a) be in writing, (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and the Supplemental Order Under 11 U.S.C. §§ 102(1) And 105 And Fed. R. Bankr. P. 2002(m), 9006, 9007, And 9014 Establishing Omnibus Hearing Dates And Certain Notice, Case Management, And Administrative Procedures, entered by this Court on March 20, 2006 (Docket No. 2883) (the "Supplemental Case Management Order"), (c) be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended) – registered users of the Bankruptcy Court's case filing system must file electronically, and all other parties-in-interest must file on a 3.5 inch disk (preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format), (d) be submitted in hard-copy form directly to the chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, and (e) be served upon (i) Delphi Corporation, 5725 Delphi Drive, Troy, Michigan 48098 (Att'n: General Counsel), (ii) counsel to the Debtors, Skadden, Arps, Slate, Meagher & Flom LLP, 155 North Wacker Drive, Chicago, Illinois 60606 (Att'n: John Wm. Butler, Jr. and Albert L. Hogan III) and Skadden, Arps, Slate, Meagher & Flom LLP, 4 Times Square, New York, New York 10036 (Att'n: Kayalyn A.

Marafioti), (iii) counsel for the official committee of unsecured creditors, Latham & Watkins LLP, 885 Third Avenue, New York, New York 10022 (Att'n: Robert J. Rosenberg and Mark A. Broude), (iv) counsel for Parnassus Holdings II, LLC, Schulte Roth & Zabel LLP, 919 Third Avenue, New York, New York 10022 (Att'n: Adam C. Harris), (v) counsel for General Motors Corporation, Weil, Gotshal & Manges LLP, 767 Fifth Avenue New York, New York 10153 (Att'n: Jeffrey L. Tanenbaum), and (vi) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, Suite 2100, New York, New York 10004 (Att'n: Brian Masumoto).

PLEASE TAKE FURTHER NOTICE that only those objections made as set forth herein and in accordance with applicable rules will be considered by the Bankruptcy Court at the Hearing. If no such objections to the Motion are filed and served, the Bankruptcy Court may enter an order granting the Motion without further notice.

Dated: New York, New York
June 25, 2009

SKADDEN, ARPS, SLATE, MEAGHER
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- and -

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